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June 25, 2002

**VIA E-MAIL**

Mary L. Cottrell  
Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, Massachusetts 02110

**Re: MA D.T.E. 02-8**

Dear Secretary Cottrell:

Covad Communications Company ("Covad"), by the undersigned, respectfully requests an opportunity to file further testimony in response to Verizon's Panel Surrebuttal Testimony, filed with the Department on June 18, 2002. If this request is granted, Covad will file the additional testimony no later than June 28, 2002, per the Department's procedural schedule.

Based upon the assertions made and information provided by Verizon in its Panel Surrebuttal Testimony, Covad believes that a further response is warranted. As before, Verizon seeks to expand the scope of this proceeding to include matters and occurrences outside the Commonwealth of Massachusetts. Verizon also makes certain unsubstantiated assertions about additional security risks posed by CLEC employees' and the benefits of its proposed security measures, but fails to adequately address the relative costs of its proposed measures and the effects of such on facilities-based local competition in Massachusetts. Covad posits that these issues must be further addressed in the record and seeks to do so through the filing of additional testimony.

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For the foregoing reasons, Covad respectfully requests an opportunity to file additional testimony in this proceeding by June 28, 2002.

Respectfully submitted,

Jason Karp  
Andrea P. Edmonds\*\*

On behalf of  
Tony Hansel, Senior Counsel,  
Covad Communications Company

cc: Joan Evans, Hearing Officer  
Service List

\*\* Admitted to practice in the District of Columbia only.